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*Attorneys for Plaintiff Johnny Wang, on his own  
behalf and behalf of all others similarly situated,*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

JOHNNY WANG, an individual, on his  
own behalf and on behalf of all others  
similarly situated,

Plaintiff,

v.

ASSET ACCEPTANCE, LLC, and  
TRANS UNION, LLC, Delaware limited  
liability companies, and DOES 1-100,  
inclusive,

Defendants.

No. 09-04797 SI

Judge Susan Illston

Magistrate Judge Edward M. Chen

**STIPULATION AND [PROPOSED]  
ORDER CONTINUING SETTLEMENT  
CONFERENCE AND RELATED  
DEADLINES**

1 Plaintiff Johnny Wang (“Wang”) and Defendants Asset Acceptance, LLC (“Asset”) and  
2 Trans Union, LLC (“Trans Union”) hereby stipulate to continue the January 25, 2011 settlement  
3 conference and certain other case management-related deadlines pursuant to Local Rule 6-2:

4 WHEREAS,

5 1. At the September 3, 2010 scheduling conference, the parties stipulated to (1) a  
6 deadline for mediation; and (2) a date for a case management conference. (Dkt. #93.) The parties  
7 subsequently agreed to referral to Magistrate Judge Edward M. Chen for the purposes of a  
8 settlement conference. (Dkt. #97.)

9 2. Defendants had various scheduling conflicts with the date initially set for the  
10 settlement conference. In order to accommodate these conflicts, the parties stipulated to continue  
11 the settlement conference to January 25, 2011 (and to continue the mediation deadline and the  
12 case management conference until appropriate intervals after the settlement conference). (Dkt.  
13 #101.)

14 3. Based on discovery conducted and documents produced by Defendants, Plaintiff  
15 has recently come to a better understanding of the events underlying his claims. Based on his  
16 understanding of the Defendants’ respective positions, Plaintiff asserts that a successful  
17 settlement conference will require some additional discovery that will enable the parties to  
18 effectively assess and evaluate Plaintiff’s claims at the settlement conference. This discovery is  
19 primarily focused on certain interactions between Asset and Trans Union between May and  
20 October 2009, and how those interactions may be material to allocating liability on Plaintiff’s  
21 claims as between the respective Defendants.

22 4. Plaintiff served written discovery on the Defendants on December 17, 2010.  
23 Plaintiff seeks to take one Rule 30(b)(6) deposition from each Defendant after receiving  
24 Defendants’ responses to the written discovery. However, due to the scheduling constraints of  
25 counsel and their clients, the parties agree that they are unable to complete the depositions  
26 sought by Plaintiff prior to the January 25, 2011 settlement conference.  
27  
28

1           5.       The parties have consulted with Judge Chen's clerk and have determined that the  
2 next available date on Judge Chen's calendar which will both accommodate the additional  
3 discovery described above and the parties' schedules is March 24, 2011.

4           THEREFORE, the parties stipulate and hereby request the Court order that:

5           1.       The settlement conference currently set before Magistrate Judge Chen on  
6 January 25, 2011 is continued to March 24, 2011 at 9:30 a.m.;

7           2.       The deadline for the parties to conduct mediation is continued to March 24, 2011.

8           3.       The case management conference currently set for February 11, 2011 should be  
9 continued at the Court's convenience until 4/8/11. The parties will discuss with the  
10 Court whether the other deadlines in the present case management order remain appropriate at  
11 the next case management conference.

12           Dated: January 21 , 2011

13           By: s/David C. Parisi

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29           Dated: January 21, 2011

30           By: s/William R. Brown

31           Robert J. Schuckit (pro hac vice)  
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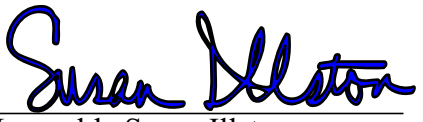
Dated: January 21, 2011

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*Attorneys for Defendant  
Asset Acceptance, LLC*

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: January 21, 2011

By:   
The Honorable Susan Illston  
United States District Court  
For the Northern District of California